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Attorneys for Defendant D.2801 Westwood, Inc. d/b/a Treasures

### UNITED STATES DISTRICT COURT

### DISTRICT OF NEVADA

THEODORE TRAPP, on his own behalf and on behalf of all others similarly situated,

### Plaintiff,

V.

BIG POPPA'S, LLC, A Nevada limited liability company d/b/a BADDA BING MEN'S CLUB: SKY TOP VENDING, INC., a Nevada Corporation d/b/a CAN CAN ROOM; LA FUENTE, INC., a Nevada corporation d/b/a CHEETAH's; C.P.FOOD BEVERAGE, INC., a Nevada AND corporation d/b/a CLUB PARADISE; DÉJÀ VU SHOWGIRLS OF LAS VEGAS, LLC, a Nevada limited liability company d/b/a DÉJÀ VU SHOWGIRLS; PALOMINO CLUB. INC.; SHAC, LLC, a Nevada limited liability company d/b/a SAPPHIRE; K-KEL, INC., a Nevada corporation d/b/a SPEARMINT RHINO; D.2801 WESTWOOD, INC., a Nevada corporation d/b/a TREASURES; LITTLE DARLINGS OF LAS VEGAS, LLC. a Nevada limited liability company d/b/a LITTLE DARLINGS; O.G. ELIADES, A.D., LLC, a Nevada limited liability company d/b/a **OLYMPIC** GARDENS: LAS **VEGAS** ENTERTAINMENT, LLC, a Nevada limited liability company d/b/a LARRY FLYNT's HUSTLER CLUB; MICHAEL A. SALTMAN d/b/a MINXX; RICK'S LAS VEGAS; FRIAS MANAGEMENT, LLC, a Nevada limited company d/b/a ACE liability CAB COMPANY and A-NORTH LAS VEGAS CAB; WESTERN CAB COMPANY, a

Case No.: 2:09-cv-00995

## [PROPOSED]

STIPULATION AND ORDER BETWEEN PLAINTIFF AND DEFENDANT D.2801 WESTWOOD, INC. d/b/a TREASURES TO EXTEND THE DEADLINE TO FILE AND SERVE ANSWER OR OTHERWISE RESPOND TO COMPLAINT

[SECOND REQUEST]

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Nevada corporation d/b/a WESTERN CAB COMPANY and WESTERN LIMOUSINE, CHECKER CAB NEVADA CORPORATION, a Nevada corporation d/b/a CHECKER CAB COMPANY,; NEVADA STAR CABCORPORATION, a Nevada corporation d/b/a STAR CAB COMPANY; NEVADA YELLOW CAB CORPORATION, a Nevada corporation d/b/a YELLOW CAB COMPANY; LUCKY CAB COMPANY OF NEVADA, a Nevada corporation d/b/a LUCKY TRANS; SUN CAB, INC., a Nevada liability company d/b/a CLS limited TRANSPORATION LAS VEGAS: ON DEMAND SEDAN SERVICES, LLC, a Nevada limited liability company d/b/a ODS LIMOUSINE and ODS CHAUFFEURED TRANSPORTATION; BLS LIMOUSINE SERVICE OF LAS VEGAS, INC., a Nevada d/b/a BLS LIMOUSINE corporation SERVICE OF LAS VEGAS; DESERT CAB, INC., a Nevada corporation d/b/a DESERT COMPANY and ODYSSEY LIMOUSINE; BELL TRANS A NEVADA CORPORATION, a Nevada corporation d/b/a TRANS: TONY CHONG, individual; and DOE EMPLOYEES 1-1000;

Defendants.

IT IS HEREBY STIPULATED AND AGEED by and between Plaintiff THEODORE TRAPP ("Plaintiff"), through his attorneys JAMES E. SMYTH, II, ESQ., of Kummer, Kaempfer, Bonner, Renshaw & Ferrario, and Defendant D.2801 WESTWOOD, INC., d/b/a TREASURES ("Defendant"), through its attorney, ROSS C. GOODMAN, ESQ. of the Goodman Law Group, that the deadline for Defendant to file a response to Plaintiff's Complaint currently due to be filed on July 20, 2009 shall be extended to Monday, August 10, 2009.

### IT IS SO ORDERED.

Dated this 20 day of July, 2009.

PEGGY A. LEEN

United State Magistrate Judge

No Further Extensions

Respectfully submitted, GOODMAN LAW GROUP By: /s/ Ross C. Goodman Ross C. Goodman, Esq. (Bar No. 7722) 520 south Fourth Street, 2<sup>nd</sup> Floor Las Vegas, Nevada 89101 Attorneys for Defendant D.2801 Westwood, Inc. d/b/a Treasures A Professional Corporation 520 S. Fourth Street, 2nd Floor Las Vegas, Nevada 89101 (702) 383-5088 GOODMAN LAW GROUP 

# KUMMER, KAEMPFER, BONNER, RENSHAW & FERRARIO

By: /s/ James E. Smyth
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Attorneys for Plaintiff Theodore Trapp

# GOODMAN LAW GROUP

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# **CERTIFICATE OF MAILING**

I hereby certify that on the 16<sup>th</sup> day of July, 2009 the foregoing STIPULATION AND ORDER BETWEEN PLAINTIFF AND DEFENDANT D.2801 WESTWOOD, INC. d/b/a TREASURES TO EXTEND THE DEADLINE TO FILE AND SERVE ANSWER OR OTHERWISE RESPOND TO COMPLAINT [SECOND REQUEST] was electronically served upon all attorneys of record in this matter.

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